

425.36
06/29/98
Rev. 02

NEW SITE IDENTIFICATION

Part A – To Be Completed By Observer

1. Person Initiating Report: Wayne D. Mikesell	Phone: 533-4423
Contractor WAG Manager: Harry Williams	Phone: 526-2638
2. Site Title: TRA Acid Transfer Line from TRA-631 to TRA 645 (TRA-56)	
<p>3. Describe the conditions that indicate a possible inactive or unreported waste site. Include location and description of suspicious condition, amount or extent of condition and date observed. A location map and/or diagram identifying the site against controlled survey points or global positioning system descriptors shall be included to help with the site visit. Include any known common names or location descriptors for the waste site.</p> <p>A decontamination & Demolition (D&D) project was completed in 1997 - the TRA-645 Cooling Tower Pump House. As part of this project a three-inch, carbon steel, sulfuric acid transfer line was removed from the building and then cut off and capped approximately eight to ten feet underground and ten feet east of the southwest corner of the building. At TRA-631 pumphouse the line was disconnected and blind flanged.</p> <p>This sulfuric acid transfer line ran from TRA-631, the operational acid and caustic tank pump house, 1,608 feet south to TRA-645. It was installed in 1955-56 and has not been used since 1981.</p> <p>When the line was cut as part of the D&D process, about three to six feet of the three-inch carbon steel line was found to be plugged with solidified sulfuric acid. This was in a section of line that served as a vertical riser inside of the TRA-645 Pump House. When this same line was cut at the elevation below grade where it penetrated the concrete foundation to exit the building, liquid concentrated sulfuric acid was discovered within the line. Both the liquid and the solid phase sulfuric acid was collected, managed, and disposed as D009 hazardous waste since analysis showed mercury levels in the solid phase in excess of 130ppm.</p> <p>Because of the discovery of sulfuric acid in both the solid and liquid phase in this line, it is reasonable to believe that the remainder of the line could be contaminated with liquid or solidified sulfuric acid and mercury. The remaining line, about 1,598 feet of three-inch carbon steel pipe between the previous location of TRA-645 and the current location of TRA-631 is still in place. It should be noted that the integrity of the carbon steel pipe appears secure. During the D&D activity, a visual inspection of the three-inch carbon steel pipe appeared satisfactory. A map is attached as Figure 1 which shows the line from ground level to as much as ten feet below ground surface.</p> <p>Based on the information available, it has been determined that the mercury-contaminated sulfuric acid contained in this line is hazardous waste, and is a potential release to the environment.</p> <p>Because of the hazardous waste remaining in this line that was not recovered as part of the TRA-645 D&D project, it is proposed that it be identified as a new CERCLA site and further evaluated.</p> <p><i>THE LINE</i></p>	

Part B – To Be Completed By Contractor WAG Manager

4. Recommendation:
<p><input checked="" type="checkbox"/> This site meets the requirements for an inactive waste site, requires investigation, and should be included in the INEEL FFA/CO Action Plan. Proposed Operable Unit assignment is recommended to be included in the FFA/CO.</p> <p>WAG: 2 Operable Unit: 2-14</p> <p><input type="checkbox"/> This site DOES NOT meet the requirements for an inactive waste site, DOES NOT require investigation and SHOULD NOT be included in the INEEL FFA/CO Action Plan.</p>

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5. Basis for the recommendation:

No release to the environment has been documented. However, since sulfuric acid remains in the line with mercury contamination, it must be considered a potential release. The industrial grade sulfuric acid supplied was known to have mercury contamination. Further evaluation is required to completely estimate the risks from all contaminants potentially in this line, and to fully evaluate all of the exposure pathways from the pipe which goes from ground level to as much as ten feet below ground surface. Any soil disturbance along the pipeline could result in potential exposure pathways of ingestion and inhalation of contaminated soil. There are no interfaces with other programs.

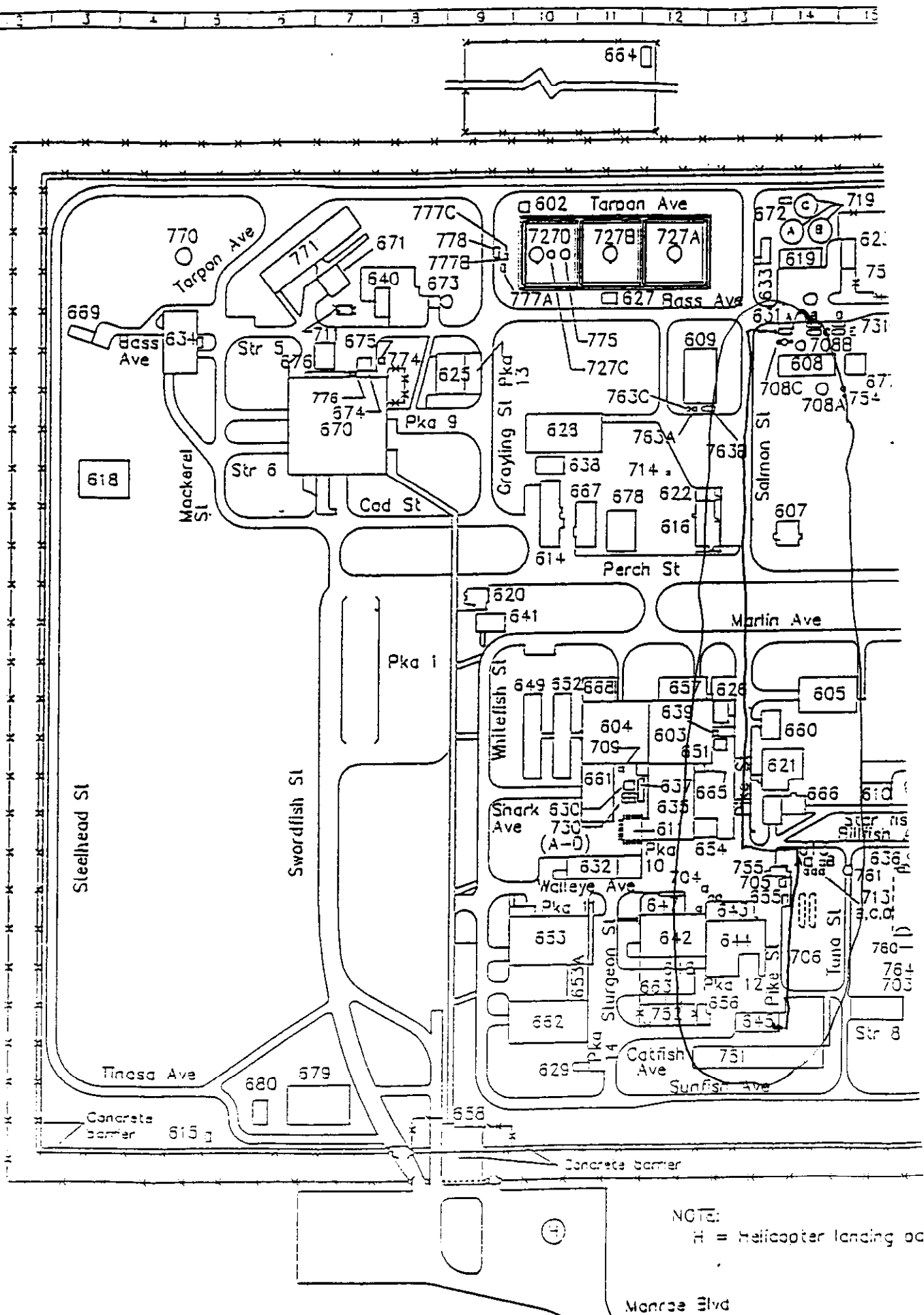
The basis for recommendation must include: (1) source description; (2) exposure pathways; (3) potential contaminants of concern; and (4) descriptions of interfaces with other programs, as applicable (e.g., D&D, Facility Operations, etc.)

6. Contractor WAG Manager Certification: I have examined the proposed site and the information submitted in this document and believe the information to be true, accurate, and complete. My recommendation is indicated in Section 4 above.

Name: Harry Williams

Signature: 

Date: 12/8/98



NOTE:

H = Helicopter landing pad

Monroe Blvd

FIGURE 1

NEW SITE IDENTIFICATION

Part C – To Be Completed By DOE WAG Manager

7. DOE WAG Manager Concurrence:

WAG Operable Unit:

☒ Concur with recommendation.

☐ Do not concur with the recommendation. Explanation follows:

Name: GUENN NELSON

Signature: 

Date: 24 Dec 98

Part D – To Be Completed By The INEEL FFA/CO Responsible Program Managers (RPM's)

8. FFA/CO RPM's Concurrence:

TRA-56 NSIF dtd 12/8/98



For DOE-ID

Name: Kathleen Hain

Signature: 

Date: 12/24/98



Concur



Do not concur. Explanation follows:

For EPA Region X

Name: Wayne Pierre

Signature: 

Date: 3/4/99



Concur



Do not concur. Explanation follows:

For State of Idaho

Name: Dean Nygard

Signature:  Date: 3/9/99



Concur



Do not concur. Explanation follows: